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October 31, 2011

## VIA E-FILING

Lester A. Heltzer, Esq. Executive Secretary National Labor Relations Board 1099 14<sup>th</sup> Street, NW – Suite 5530 Washington, DC 20570-0001

Re: NBC Universal, Inc. and NABET-CWA, Case Nos. 2-UC-00619, et al.

Dear Mr. Heltzer:

Peter Hurtgen and I are counsel for Respondent NBCUniversal, Inc. in the above-referenced matter. The decision from Region 2 in these consolidated cases was issued on October 26, 2011, and Mr. Hurtgen and I received that decision on Wednesday of last week. NBCUniversal will be filing a Request For Review with the Board. Under the Board's Rules, NBCUniversal's deadline for responding absent an extension would be November 9, 2011. (See NLRB Rule 102.67(b)). I am sending this letter pursuant to Rule 102.67(k)(3), requesting an eight-week extension of NBCUniversal's deadline for filing that Request For Review. The reasons for that request for an extension of time are set out below.

This matter involves six separate consolidated unit clarification petitions, and the hearings in this matter were held in four different cities (New York, Washington, D.C., Los Angeles, and Chicago). The matter involved 24 days of hearings in those four cities, and those hearing dates were spread over a period of three months. The hearings in these consolidated cases had a total of 50 witnesses, and the hearing transcript came to 3,739 pages. The decision in this matter by the Acting Regional Director in Region 2 was 84 pages in length, and addressed the multitude of factual and legal issues in these consolidated cases. Based on the number of cases, the number of witnesses, the length of the record, and the number and complexity of the issues involved in this matter, the

Lester A. Heltzer, Esq. Page 2 October 31, 2011

Acting Regional Director in Region 2 had this matter under consideration for nearly five months after the close of the hearing in this matter before issuing his decision last week. In addition, Mr. Hurtgen, I, and the NBCUniversal counsel working with us on this matter have significant bargaining commitments and other professional and personal commitments over the next several weeks. Under the circumstances, in order to address the issues in its Request For Review, NBCUniversal believes that an extension of eight weeks (from November 9 through January 4, 2012) is fair and warranted.

Although not explicitly required by Rule 102.67(k)(3), I have solicited the views of the five union-side counsel involved in these proceedings with regard to this request. Counsel for NABET-CWA Locals 11, 31, and 53 (Mr. Peek, Mr. Powers, and Mr. Phillips) responded on Friday and stated that their clients would defer to the Sector on the request. Counsel for the Sector and NABET-CWA Local 41 (Ms. Chartier) responded earlier this afternoon and stated that her clients would not agree to an eight-week extension but would only consent to an extension of two weeks. Counsel for AFTRA (Ms. Raulerson) responded this afternoon and informed me that AFTRA does not oppose the request. Again, under the circumstances NBCUniversal believes that the eight weeks requested is both fair and warranted.

Thank you for your consideration of this request, and we will look forward to hearing from you with regard to it. So that NBCUniversal, Mr. Hurtgen, and I can plan appropriately, we would appreciate hearing from you at your earliest possible convenience.

Respectfully,

Michael A. Curley

c: Elbert F. Tellem, Esq. Judiann Chartier, Esq.

Barry J. Peek, Esq.

Ralph M. Phillips, Esq.

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Brian A. Powers, Esq.

Anee P. Raulerson, Esq.

Peter J. Hurtgen, Esq.

## CERTIFICATE OF SERVICE

I hereby certify that I served the above electronically-filed letter request for an extension of time to file NBCUniversal's Request For Review of the Region 2 Acting Regional Director's Decision and Order in this matter on the Acting Regional Director of Region 2 of the National Labor Relations Board, on counsel for NABET-CWA and NABET-CWA Local 41, Judiann Chartier, on counsel for NABET-CWA Local 11, Barry J. Peek, on counsel for NABET-CWA Local 31, Brian A. Powers, on counsel for NABET-CWA Local 53, Ralph M. Phillips, and on counsel for AFTRA, Anee P. Raulerson, electronically via e-mail on the 31st day of October, 2011.

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